Tamara Preiss Vice President Federal Regulatory Affairs



October 11, 2011

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Ex Parte

Marlene H. Dortch Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Re: <u>Draft Environmental Notice Requirements and Interim Procedures</u>

<u>Affecting the Antenna Structure Registration Program, WT Docket Nos.</u>

<u>08-61 and 03-187</u>

Dear Ms. Dortch:

On October 6, 2011, Tamara Preiss and Andy Lachance of Verizon and, by telephone, Jerri Lynn Janjua and Robin Haeffner of Verizon Wireless met with Jane Jackson, Jeff Steinberg, Aaron Goldschmidt and Mania Baghdadi of the Wireless Telecommunications Bureau and Marilyn Sonn, Aliza Katz, and Lee Martin of the Office of General Counsel to discuss the proposed interim notice requirements in the above-captioned proceeding.

During the meeting, Verizon and Verizon Wireless (collectively "Verizon") explained that, although the Commission must adopt notification rules to comply with the mandate in *Amercian Bird Conservancy v. FCC*, the Commission should seek to minimize the effects of the notification requirements so as not to impose undue costs and delays on wireless facilities siting. In particular, Verizon requested that the Commission modify the proposed rules and procedures to implement the six suggested changes set forth in the comments Verizon Wireless filed on May 5, 2011.²

¹ 516 F.3d 1027 (D.C. Cir. 2008).

² Wireless Telecommunications Bureau Invites Comment on Draft Environmental Notice Requirements and Interim Procedures Affecting the Antenna Structure Registration Program, WT Docket Nos. 08-61, 03-187, Comments of Verizon Wireless (filed May 5, 2011)(asking the Commission to amend the draft rules to exclude twoers under 351 feet; exclude towers under 200 feet that are not marked or lit; shorten the public notice period to 15 days; increase staff to handle the additional work associated with the proposed rules; eliminate need for duplicative filings; and clarify that licensing applications unrelated to a pending ASR will not be held up).

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This letter is submitted pursuant to section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

Jones Grein

cc: (via e-mail)

Jane Jackson Jeff Steinberg Aaron Goldschmidt Mania Baghdadi

Marilyn Sonn Aliza Katz Lee Martin